

Remarks:

The amendments to the specification are provided herein to provide information that was unavailable at the time of filing the present application. In particular, two patent applications that were filed simultaneously with the present invention, and which are incorporated by reference herein, have published. As such, the publication numbers of these applications have been amended into the specification. Additionally, one patent application that was filed simultaneously with the present invention, and which is incorporated by reference herein, has issued. As such, this patent number has been amended into the specification. No new matter has been added.

In the present paper, claims 1-19 are pending. No claims have been amended herein.

Allowable Subject Matter

The applicants would like to thank the Examiner for early indication of allowable subject matter with regard to claim 19. The applicants would further like to thank the Examiner for the indication of allowable subject matter in dependent claims 2, 4, 6, 9-11 and 13-18 if such claims were written into dependent form. The applicants have not re-written these claims into independent form because the applicants believe that the corresponding base claims define over the cited art as set out more fully herein.

35 U.S.C. § 102(b)

Claims 1, 3, 5, 7-8 and 12 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Pat. No. 5,933,184 to *Ishigami*. In accordance with M.P.E.P. § 706.02, in order to be anticipating under §102, the reference must teach every aspect of the claimed invention. Of the rejected claims, Claims 1 and 12 are in independent form.

With regard to claim 1, *Ishigami* fails to teach or suggest at least:

a method of electronically compensating for process direction position errors of a laser beam ... comprising ... converting a laser beam scan path model into a Pel profile that characterizes process direction

position errors of Pels written by a laser ... and warping a bitmap image based upon the Pel profile prior to writing the bitmap image by the laser beam

Ishigami is silent with regard to and does not disclose, teach or suggest electronic compensation for *process direction* position errors of a scanning laser beam. Rather, *Ishigami* teaches an image forming device that corrects for uniform velocity errors of a scanning laser beam *in a scanning direction* that result from errors in surface accuracy of the facet surfaces of a rotary polygonal mirror.¹ *Ishigami* does this by altering the timing of the video clock that modulates the power to a laser beam as it is scanned across the surface of a photoconductive drum in accordance with uniform velocity correction data previously created for each facet surface and stored in a storage unit.² *Ishigami* is completely silent with respect to compensation for, or otherwise correction of, laser beam *process direction position errors*. In this regard, the process direction is orthogonal to the scan direction.

Further, *Ishigami* is silent with regard to, and does not disclose, teach or suggest warping a bitmap image that is based upon a Pel profile that characterizes *process direction* position errors prior to writing the bitmap image by the laser beam, as recited in Claim 1. *Ishigami* corrects only for laser beam position errors occurring in a scan direction as previously discussed. Moreover, the correction disclosed in *Ishigami* performs corrections by altering the timing of control signals that print a corresponding bitmap image file. Nowhere in *Ishigami* is there any suggestion of warping a bitmap image based upon the Pel profile prior to writing the bitmap image by the laser beam, as claimed.

In view of these arguments and clarifying comments, the applicants respectfully request that the rejection of Claim 1, and the claims that depend therefrom, be withdrawn.

¹ See, *Ishigami*, Abstract, Col. 2, line 49 – Col. 3, line 16, Col. 4, lines 52-55, Col. 12, lines 32-59.

² See, *Ishigami*, Abstract, Col. 4 lines 52-65, Col. 12, lines 20-63, Figs. 6, 9, 10(a)-11(b).

Independent Claim 12 recites elements similar to Claim 1 and as such, the arguments set forth above apply by analogy to Claim 12. Accordingly, the applicants respectfully request that the rejection of independent Claim 12, and the claims that depend therefrom, be withdrawn.

Claim Objections

Claims 2, 4, 6, 9-11 and 13-18 are objected to as depending from a rejected base claim. In consideration of the arguments presented above with regard to Claims 1 and 12, the applicants respectfully request that the objection to Claims 2, 4, 6, 9-11 and 13-18 be withdrawn.

Conclusion

For all of the above reasons, the applicants respectfully submit that the above claims recite allowable subject matter. The Examiner is encouraged to contact the undersigned to resolve efficiently any formal matters or to discuss any aspects of the application or of this response. Otherwise, early notification of allowable subject matter is respectfully solicited.

Respectfully submitted,
STEVENS & SHOWALTER, L.L.P.

By /S. Dean Taylor/
S. Dean Taylor
Reg. No. 53,679

7019 Corporate Way
Dayton, OH 45459-4238
Telephone: 937-438-6848
Fax: 937-438-2124

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